

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
NO. 5:18-CR-452-1-FL

UNITED STATES OF AMERICA	)	
	)	
	)	
v.	)	<b>MOTION FOR LEAVE TO FILE</b>
	)	<b>REPLY BRIEF</b>
	)	
LEONID ISAAKOVICH TEYF	)	

NOW COMES DEFENDANT Leonid I. Teyf, through undersigned counsel, and respectfully moves this Court for an order granting him leave to file the attached Reply to the Government's Response in Opposition to his Motion to Suppress and Release Property filed at DE-182. In support of this Motion, undersigned counsel shows the Court the following:

1. Defendant filed a Motion to Suppress and Release Property on 15 March 2019 at DE-182 seeking the release of seized assets. The Government filed a response in opposition to this motion on 26 March 2019 at DE-197.

2. The Local Criminal Rules do not explicitly provide for the opportunity to file a Reply to the Government's response to bring to the Court's attention caselaw relevant to arguments made by the Government that Defendant could not reasonably anticipate, so did not address in advance. Defendant respectfully requests leave to file a Reply to address the matters raised in the Government's response.

WHEREFORE, Defendant respectfully requests that this Motion be granted, and that the Court enter an order granting leave for Defendant to file the attached Reply.

This the 4<sup>th</sup> day of April, 2019.

By: /s/ James P. McLoughlin, Jr.

James P. McLoughlin, Jr.

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### **CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of April, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I also served a copy of the foregoing upon counsel for the United States in this action by sending a copy to each counsel by electronic communication as referenced below:

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